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Comments from Portland General Electric on Proposed Electricity-Related Amendments to the Climate Commitment Act

December 20, 2023

Portland General Electric appreciates the opportunity to comment on the Washington Department of Ecology's agency request legislation to amend the Climate Commitment Act (CCA) to facilitate linkage. PGE is a vertically integrated utility engaged in generating and distributing electricity to approximately 900,000 customers across a service area population of 2 million Oregonians in seven counties and 51 cities. As Oregon's largest electricity supplier, we participate in energy markets with many Washington utilities, have compliance obligations under the CCA, and own and contract for clean energy generated in Washington.

We offer the following comments on proposed CCA amendments based on Ecology's stakeholder email of December 11th and the draft bill language available on that date.

Electricity imports (RCW 70A.65.010(27)):

PGE Comments: PGE supports formal adoption of scenarios described in the EPE white paper by administrative rule to provide clarity and certainty for the market as to the treatment of imported power. It is especially important that Ecology ensure that power with a physical path through the MID-C trading hub that does not sink to load in Washington state be excluded from CCA compliance obligations. PGE utilizes the MID-C trading hub to bring power to our retail customer load in Oregon.

Removing requirement that "netting" be reported (RCW 70A.65.010(42)(d)):

PGE Comments: While PGE supports Ecology's additional review of the netting provisions in RCW 70A.65.010 to facilitate linkage, PGE does not support removal of the netting provisions without Ecology taking additional steps through administrative rule to maintain lesser-of calculations that were identified in the Electricity Imports Whitepaper (e.g., Appendix 1 and 2). For example, in Appendix 1, the Electricity Imports Whitepaper used PGE's MIDC activity to illustrate how PGE could use metered generation and e-tags to demonstrate Washington resources were used to meet the energy deliveries from wholesale power sales to Washington entities. However, during PGE's reporting of covered emissions from Emission Year 2022, PGE found the netting functionality of Ecology's reporting tool to be the only reporting mechanism available to an Entity seeking to fully demonstrate a lesser-of-analysis from a location like PGE's MIDC, particularly when a portion of the Washington e-tag sources may be 'unspecified'. Therefore, it is essential that alongside any changes to netting provisions, Ecology also codify and make available the lesser-of calculations as described in the Electricity Imports Whitepaper.

Thank you for your consideration of our comments. We are available to discuss them at your convenience.